

**COPY**

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
LITTLE ROCK DIVISION**

**ROBERT DAVIS**

**PLAINTIFF**

**v.**

**CASE NO.: CV-07-00521-BSM**

**UNION PACIFIC RAILROAD COMPANY**

**DEFENDANT**

**PLAINTIFF'S ANSWERS TO DEFENDANT'S SECOND SET OF INTERROGATORIES**

COMES NOW Plaintiff, Robert Davis, by and through his counsel of record, Schlichter, Bogard & Denton and Oglesby Law Firm, P.A., and for his Answers to Defendant's Second Set of Interrogatories states as follows:

INTERROGATORY NO. 1: In regard to the photographs attached to Plaintiff's April 9, 2008 Supplemental Responses to Defendant's Request for Production, please state the date the photos were taken, and the name, address and telephone number of the person who took the photos.

**ANSWER: The photographs were taken approximately in early June of 2007 at the request of Plaintiff's counsel and, therefore, objection is made to providing the identity of the photographer on the basis of work product.**

INTERROGATORY NO. 2: In regard to the photographs depicting measured rocks that were produced by Plaintiff in his April 9, 2008 Supplemental Responses to Defendant's Request for Product, please state the following: the location of where the rocks were obtained; the name, address, and telephone number of the person who took the rocks; the name, address, and telephone number of the person who is in possession of the rocks; the name, address, and telephone number of the individual who took the photographs.

**ANSWER: The rocks were collected from the site of the February 13, 2007 injury event by Plaintiff who retains possession of same.**

Respectfully submitted,

SCHLICHTER, BOGARD & DENTON



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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>h</sup> day of June, 2008 a true and correct copy of the above was delivered by email and United States First Class mail with postage prepaid to the following:  
Scott H. Tucker, Friday, Eldredge & Clark 400 W. Capitol Avenue, Ste 2000 Little Rock, AR 72201

